

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA, *ex rel.* )  
DILBAGH SINGH, M.D., PAUL KIRSCH, M.D., )  
V. RAO NADELLA, M.D., and )  
MARTIN JACOBS, M.D., )

Plaintiffs, )

v. )

BRADFORD REGIONAL MEDICAL CENTER, )  
V & S MEDICAL ASSOCIATES, LLC, )  
PETER VACCARO, M.D., )  
KAMRAN SALEH, M.D., )  
and DOES I through XX, )

Defendants. )

CIVIL ACTION NO.

**DECLARATION OF G. MARK SIMPSON**

Comes now the undersigned, G. Mark Simpson, and states the following:

1.

My name is G. Mark Simpson. I am over the age of 21 and competent to give this declaration.

2.

I graduated from the University of Georgia in 1992, and have been practicing law since that time. I am currently a partner at Bothwell & Simpson, P.C. in Roswell, Georgia. Since 2001, I have specialized in representing relators in *qui tam* actions filed under the False Claims Act.

3.

I am duly admitted to practice law and in good standing in the following courts: the United States Courts of Appeal for the Eleventh, Sixth, and D.C. Circuits; the United States District Courts for the Northern and Middle Districts of Georgia; the Supreme Court of Georgia; the Court of Appeals of Georgia; and all trial courts in the State of Georgia.

4.

I am a resident of the State of Georgia, and have not previously been admitted pro hac vice to any court in the State of Pennsylvania.

5.

I declare under penalty of perjury that the above is true and accurate.

August 23, 2005.



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G. Mark Simpson  
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